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August 12, 2008

Jay Hudson
Santee Cooper
One Riverwood Drive
Moncks Corner, SC 29461-2901

Re: Santee Cooper Pee Dee Generating Station
Case-by-Case MACT Application Additional Information Request
Permit No. 1040-0113

Dear Mr. Hudson:

The Bureau of Air Quality received on June 30, 2008, a Case-by-Case MACT application for determining hazardous air pollutant limits associated with the installation of two new coal-fired boilers at a new (Pee Dee) site in Florence County, SC. An earlier request for detailed calculations evaluating best controlled sources has been provided in the form of a PDF file, including a subsequent interactive webinar by Trinity Consultants explaining the calculations. After further review of the application and supplemental information, the Bureau has determined the following information is also needed.

1) The following information that is referenced in your application or supplemental information that the Bureau has not readily accessed:

- "Calculation of Possible Mercury MACT Floor Values for Coal-Fired Utilities: Influence of Variability and Approach" (DOE document referenced on pages 23 and 38 of application)
- "Activated Carbon Injection for Mercury Control: Overview (conference presentation referenced on page 43 of application)

2) Further analysis of the ECO system as supplemental control. The application compares the ECO system as being inferior compared to planned controls. In comparison, evaluation of the ACI system was in addition to planned controls. Please evaluate the ECO system similarly to the ACI analysis or explain infeasibility.

3) The application stipulates that the review considered other states that have state-specific mercury limits. Please provide a list of all states included in that review to include the specified limits for each state.

4) The application stipulates that the review considered other case-by-case MACT determinations that have been issued. Please provide a list of all case-by-case MACT permits included in the review and associated limits for those determinations, including any surrogate limits. Also, where available, please provide any source test results related to the case-by-case determinations.

5) The application stipulated that the review considered information from the EPA RBLC database. Please provide a list of sources you identified in the RBLC database and associated limits.

6) It is the Bureau's understanding that a focus group (including but may not have been limited to utilities) provided comments to EPA at the time of drafting of the proposed Utility MACT recommending that pulverized coal combustion units and circulating fluidized bed combustion units be considered as separate sources for purposes of establishing MACT limits. Please provide confirmation regarding this group and, if that was the case, provide as much detail and supporting information as is available concerning the recommendation.

7) Please provide a comparison of emissions based on any data that you have or are aware of between pulverized coal and circulating fluidized bed, to include criteria pollutants and HAPS, on both a controlled and uncontrolled basis.

Please submit the additional information requested in order for the review of your application to continue. Should you have any questions or comments, or if I can be of assistance, you can contact me at (803) 898-3831, or by email at ellerjc@dhec.sc.gov.

Sincerely,

Joe Eller
Engineering Services Division
Bureau of Air Quality

cc: Buck Graham, Region 4, Florence EQC Office
Permit File: 1040-0113